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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TRUSTEES OF THE OPERATING  
ENGINEERS PENSION TRUST;  
TRUSTEES OF THE OPERATING  
ENGINEERS HEALTH AND WELFARE  
FUND; TRUSTEES OF THE OPERATING  
ENGINEERS JOURNEYMAN AND  
APPRENTICE TRAINING TRUST; AND  
TRUSTEES OF THE OPERATING  
ENGINEERS VACATION HOLIDAY  
SAVINGS TRUST.

Plaintiffs,

vs.

THE BARAJAS GROUP, a Nevada  
Corporation,

Defendant.

Case No.: 2:24-cv-01410-APG-NJK

**STIPULATION TO EXTEND DEADLINE  
FOR DEFENDANT TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiffs Trustees of the Operating Engineers Pension Trust, Trustees of the Operating Engineers Health and Welfare Fund, Trustees of the Operating Engineers Journeyman and Apprentice Training Trust, and Trustees of the Operating Engineers Vacation Holiday Savings Trust, ("Plaintiffs"), through their counsel, the law firm of Laquer, Urban, Clifford, and Hodge LLP, and Defendant, The Barajas Group ("Defendant"), by and through its counsel, the law firm of Jackson Lewis P.C., that Defendant shall have an extension up to and including November 7, 2024, in which to file its response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1           1.       Plaintiffs filed their Complaint on August 1, 2024 in the United States District Court,  
2 District of Nevada, Case No. 2:24-cv-01410-APG-NJK. The Summons and Complaint were served  
3 on or about August 6, 2024.

4           2.       On September 12, 2024, the Parties filed their first request for an extension of time  
5 for Defendant to file a response to Plaintiff's Complaint to September 27, 2024.

6           3.       Although the Court noted that Defendant was not represented by legal counsel at the  
7 time, the request was granted.

8           4.       Defendant subsequently retained the undersigned law firm as counsel in this matter.

9           5.       As Defendant's counsel was recently retained, counsel needs sufficient time to  
10 investigation the allegations in the Complaint, confer with Defendant's representatives, and prepare  
11 Defendant's response to the Complaint.

12          6.       This is the second request for an extension of time for Defendant to file a response  
13 to Plaintiff's Complaint.

14          7.       This Stipulation is made in good faith and not for the purpose of delay.

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